

FEDERAL DEFENDER OFFICE

DISTRICT OF MASSACHUSETTS
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November 5, 2004

Donald Cabell
Assistant U.S. Attorney
U.S. Attorney's Office
U.S. Courthouse, Suite 9200
1 Courthouse Way
Boston, MA 02210

Re: United States v. Shawn Sandler
Criminal No. 04-10148-RCL

Dear Don:

I am writing to request the following discovery regarding Robert Toro and Kori Olsen:

1) a copy of the informant agreement with ATF (possibly form 3252.2);

2) a copy of the request for confidential informant authorization (possibly form 3252)¹;

3) copies of the ATF request for payment forms regarding each payment made to Toro and Olsen, whether or not in relation to this investigation, subject to redaction of privileged information regarding other investigations; and

4) information regarding any past treatment for substance abuse or mental illness, and any information regarding use of or addiction to illegal substances or regarding a history of mental illness.

¹ Based upon experience in other cases, this form includes information regarding, inter alia, criminal and substance abuse history, reliability, and reason for becoming an informant.

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Thank you for your cooperation in this matter. Please call me if you have any questions.

Sincerely,

Miriam Conrad 
Miriam Conrad

MC:bab

cc: Clerk of Court